

**IN THE UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF TEXAS  
DALLAS DIVISION**

D&T PARTNERS, LLC (successor in interest  
to ACET VENTURE PARTNERS, LLC),  
Directly and Derivatively on Behalf of ACET  
Global, LLC and BAYMARK ACET  
HOLDCO, LLC

and

ACET GLOBAL, LLC

Plaintiffs,

v.

BAYMARK PARTNERS, LP; BAYMARK  
PARTNERS MANAGEMENT, LLC; SUPER  
G CAPITAL, LLC; SG CREDIT PARTNERS,  
INC.; BAYMARK ACET HOLDCO, LLC;  
BAYMARK ACET DIRECT INVEST, LLC;  
BAYMARK PARTNERS; DAVID HOOK;  
TONY LUDLOW; MATTHEW DENEGRE;  
WILLIAM SZETO; MARC COLE; STEVEN  
BELLAH; ZHEXIAN “JANE” LIN; DANA  
MARIE TOMERLIN; PADASAMAI  
VATTANA; PAULA KETTER; VANESSA  
TORRES; WINDSPEED TRADING, LLC;  
HALLETT & PERRIN, P.C.; and JULIE A.  
SMITH,

Defendants.

Civil Action No. 3:21-CV-01171-B

**DEFENDANTS’ UNOPPOSED MOTION TO EXTEND DEADLINE TO  
RESPOND TO PLAINTIFF’S FIRST AMENDED COMPLAINT**

COME NOW Defendants Baymark Partners Management, LLC; Super G Capital, LLC;  
SG Credit Partners, Inc.; Baymark ACET Holdco, LLC; Baymark ACET Direct Invest, LLC;  
Baymark Partners; David Hook; Tony Ludlow; Matthew Denegre; William Szeto; Marc Cole;  
Steven Bellah; Zhexian “Jane” Lin; Dana Marie Tomerlin; Padasamai Vattana; Paula Ketter;

Vanessa Torres; Windspeed Trading, LLC; Hallett & Perrin, P.C.; and Julie A. Smith (collectively, “Defendants”) and file their Unopposed Motion to Extend Deadline to Respond to Plaintiff’s First Amended Complaint (herein “Motion”). Defendants respectfully request the Court extend the deadline for all Defendants to answer or otherwise respond to Plaintiff’s First Amended Complaint to on or before November 3, 2021, as authorized by Federal Rule of Civil Procedure 6(b).

### **I. PROCEDURAL BACKGROUND**

1. Plaintiff D&T Partners, LLC, successor in interest to ACET Venture Partners, LLC, (herein “Plaintiff”) filed its First Amended Complaint on September 30, 2021. In that First Amended Complaint, Hallett & Perrin, P.C. and Julie A. Smith were added as Defendants.

2. The deadline for all Defendants other than the two newly added Defendants to answer or otherwise respond to the First Amended Complaint is October 14, 2021.

3. Defendants Hallett & Perrin, P.C. and Julie A. Smith were served with the First Amended Complaint on October 4, 2021. As such, their deadline to answer or otherwise respond to the First Amended Complaint is October 25, 2021.

4. To allow all Defendants sufficient time to prepare their respective responses to the First Amended Complaint, as well as to provide a uniform deadline by which all Defendants have to respond to the First Amended Complaint, Defendants seek to extend their respective deadlines to answer or otherwise respond to the First Amended Complaint to November 3, 2021. Plaintiff does not oppose the requested extension.

## **II. ARGUMENT**

5. A court may grant a request to extend time for good cause. Fed. R. Civ. P. 6(b)(1)(A); *Doss v. Helpenstell*, 699 F. App'x 337, 339 (5th Cir. 2017) (“A district court’s decision to grant a request for an extension of time is reviewed only for an abuse of discretion.”).

6. As noted above, Defendants seek to extend the deadline for them to answer or otherwise respond to the First Amended Complaint, in part, to provide a uniform response date for all Defendants.

7. Good cause exists for the requested extension, and it is not being sought for purposes of delay.

## **III. PRAYER**

WHEREFORE, Defendants respectfully request that the Court enter an order extending the deadline for all Defendants to answer or otherwise respond to the First Amended Complaint to November 3, 2021.

Respectfully submitted,

**HALLETT & PERRIN, P.C.**

By: /s/ Edward P. Perrin, Jr.

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**CERTIFICATE OF CONFERENCE**

Undersigned counsel certifies that Defendants' respective counsel conferred with counsel for Plaintiff, Jason Freeman, via e-mail, and Mr. Freeman indicated he is unopposed to the relief sought herein.

/s/ Edward P. Perrin, Jr.  
Edward P. Perrin, Jr.

**CERTIFICATE OF SERVICE**

I hereby certify that I caused a true and correct copy of the foregoing to be served on counsel of record on October 11, 2021 via the Court's CM/ECF system pursuant to the local rules of this Court.

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/s/ Edward P. Perrin, Jr.  
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